



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING



LIESL EICHLER CLARK
DIRECTOR

March 16, 2020

UPS NEXT DAY DELIVERY

Mr. Craig Metzger
Gerdau Special Steel North America
3000 East Front Street
Monroe, Michigan 48161

SRN: B7061; Monroe County

Dear Mr. Metzger:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) reviewed the Continuous Emission Monitoring System (CEMS) Certification Test Report submitted by Gerdau Special Steel North America located in Monroe, Michigan. Permit to Install (PTI) 75-18 requires the facility to monitor and record Carbon Monoxide (CO) emissions from EUEAF on a continuous basis in a manner and with instrumentation acceptable to the AQD. PTI 75-18 also requires Gerdau Special Steel North America to comply with emission limits for CO.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EUEAF (SVBH-01-Stack1) EUEAF (SVBH-01-Stack2)	PTI 75-18 EUEAF, VI, 4	The permittee shall continuously monitor and record, in a satisfactory manner, the SO ₂ and CO emissions and flow from the EAF baghouse stacks (SVBH-01-Stack1 and SVBH-01-Stack2) of EUEAF. The permittee shall operate each Continuous Emission Rate Monitoring System (CERMS) to meet the timelines, requirements and reporting detailed in Appendix B and shall use the CERMS data for determining compliance with SC I.10, I.12, I.13, I.14, and I.15 for both stacks combined.

Mr. Craig Metzger
Page 2
March 16, 2020

Process Description	Rule/Permit Condition Violated	Comments
EUEAF (SVBH-01-Stack1) EUEAF (SVBH-01-Stack2)	PTI 75-18 EUEAF, VI, 4	Failure to continuously monitor Carbon Monoxide.

Process Description	Rule/Permit Condition Violated	Comments
EUEAF (SVBH-01-Stack1) EUEAF (SVBH-01-Stack2)	PTI 75-18 EUEAF, I, 13	Excess emissions for Carbon Monoxide exceeded allowable limits.

The 2019 fourth quarter excess emission reports indicate excess periods of CO monitor downtime for EUEAF, Stack 1 and Stack 2 of 22.28 percent and 27.64 percent. In addition, the excess emission report indicates the total duration of excess emissions for EUEAF, Stack 1 and Stack 2 (55.72 percent) exceeded allowable limits.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 6, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Gerdau Special Steel North America believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below or e-mail to PattersonD2@michigan.gov.

Sincerely,



David Patterson
Environmental Quality Analyst
Air Quality Division
517-256-4388

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Scott Miller, EGLE
Mr. Mike Kovalchick, EGLE
Ms. Jenine Camilleri, EGLE